

EXHIBIT 4
FULL NOTICE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

**MELITA MEYER, et al., v.
BEBE STORES, INC.**

Case No. 14-cv-00267-YGR

Related Case

Case No.: 14-CV-01968-YGR

NOTICE OF CLASS ACTION AND PROPOSED SETTLEMENT

TO: All persons in the United States who provided their mobile telephone number to bebe in one of bebe's stores at the point-of-sale between October 16, 2013 and January 21, 2014 and received an SMS or text message from bebe or on its behalf before January 22, 2014, and who have not validly opted-out of being part of the Settlement of this Action.

**IF YOU ARE A MEMBER OF THIS CLASS OF PERSONS, YOU SHOULD
READ THIS NOTICE CAREFULLY BECAUSE IT WILL AFFECT YOUR
LEGAL RIGHTS AND OBLIGATIONS.**

A settlement ("Settlement") has been proposed in the class action lawsuit referenced above pending in the U.S. District Court for the Northern District of California, Case No. 14-cv-00267-YGR ("Action"). If the Court gives final approval to the Settlement, bebe stores, inc. ("bebe") will provide for each Class Member who timely submits a valid and complete Claim Form a one-time payment of \$20 ("Settlement Payment").

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT

SUBMIT A CLAIM FORM	The only way to get a Settlement Payment under the Settlement is to visit the Settlement Website located at _____ to obtain a Claim Form. A Claim Form may be submitted on the Settlement Website at _____ or by email it to the Claims Administrator at _____.	Deadline: _____ —
EXCLUDE YOURSELF	If you exclude yourself from the Settlement, you will not receive a Settlement Payment under the Settlement. Excluding yourself is the only option that allows you to ever bring or maintain your own lawsuit against bebe regarding the allegations in the Action ever again.	Deadline: _____

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT

OBJECT	You may write to the Court about why you object to (<i>i.e.</i> , don't like) the Settlement and think that it should not be approved. Filing an objection with the Court will not exclude you from the Settlement, but you must still submit a claim form to be eligible for the Settlement Payment	Deadline: _____
GO TO THE "FAIRNESS HEARING"	<p>The Court will hold a "Fairness Hearing" to consider the Settlement, the request for attorneys' fees and costs of the lawyers who brought the Action, and the Plaintiff Melita Meyer's and Courtney Barrett's request for an incentive award for bringing the Action.</p> <p>You may, but are not required to, speak at the Fairness Hearing about any objection you filed with the Court relating to the Settlement. If you intend to speak at the Fairness Hearing, you must also include as part of your objection filed with the Court a "Notice of Intention to Appear" indicating your intent to do so.</p>	Hearing Date: _____
DO NOTHING	You will not receive a Settlement Payment under the Settlement. You will also give up your right to object to the Settlement and you will not be able to be part of any other lawsuit about the allegations in the Action.	N/A

- These rights and options—**and the deadlines to exercise them**—are explained in more detail below.
- The Court in charge of this Action has preliminarily approved the Settlement and must decide whether to give final approval to the Settlement. The relief provided to Class Members will be provided only if the Court gives final approval to the Settlement and, if there are any appeals, after the appeals are resolved in favor of the Settlement. *Please be patient.*

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BACKGROUND INFORMATION

1. *Why did I get this notice?*

You received this Notice because a Settlement has been reached in the above-described Class Action. According to bebe's available records you might be a Class Member for this litigation and may be eligible for the relief detailed below.

This Notice explains the nature of the Action, the general terms of the proposed Settlement, and your legal rights and obligations. To obtain more information about the Settlement, including information about how you can see a copy of the Settlement Agreement (which defines certain capitalized terms used in this Notice), see Section 20 below.

2. *What is this action about?*

Plaintiffs Melita Meyer, Samantha Rodriguez and Courtney Barrett (the "Representative Plaintiffs") filed a lawsuit against bebe on behalf of themselves and all others similarly situated. Their complaint alleges that bebe sent SMS or text messages without the required consent to send such messages.

bebe denies each and every one of the allegations of unlawful conduct, the alleged lack of appropriate consent, any wrongdoing, and any liability whatsoever, and no court or other entity has made any judgment or other determination that bebe has violated the law or is liable to anyone that might be a Class Member. bebe further denies that any Class Member is entitled to any relief and, other than for settlement purposes. bebe denies any wrongdoing and any liability whatsoever.

The issuance of this Notice is not an expression of the Court's opinion on the merits or the lack of merits of the Representative Plaintiffs' claims in the Action.

For information about how to learn about what has happened in the Action to date, please see Section 20 below.

3. *Why is this a class action?*

In a class action lawsuit, one or more people called "Representative Plaintiff(s)" (in this Action, Plaintiffs Melita Meyer, Samantha Rodriguez and Courtney Barrett) sue on behalf of other people who have similar claims. For purposes of this proposed Settlement, the Court in which the Action was filed will resolve the issues for the Representative Plaintiffs as well as for all of the people they seek to represent (referred to as "Class Members"). The company sued in this Action, bebe, is called the Defendant.

4. *Why is there a Settlement?*

The Representative Plaintiffs have made claims against bebe. bebe denies that it has done anything wrong or illegal, and has admitted no liability. The Court has **not** decided that the Representative Plaintiffs or bebe should win this Action. Instead, both sides have agreed to

settle the Action to avoid the cost of a trial, to avoid the risks of litigation, and to avoid the Class Members being required to wait possible years for a resolution of the Action.

5. *How do I know if I am part of the Settlement?*

If you provided your mobile telephone number to bebe in one of bebe's stores at the point-of-sale (i.e., the cash register) between October 16, 2013 and January 21, 2014 and you received an SMS or text message from bebe or on its behalf before January 22, 2014, you may be eligible to receive a \$20 Settlement Payment from bebe. Excluded from the Class are bebe's Counsel, officers, directors, employees and agents, and those individuals who have validly opted-out.

6. *I'm still not sure if I am included.*

If you are still not sure whether you are included, you can submit a request for more information to the Claims Administrator for free help about whether you are a Class Member. The email address of the Claims Administrator is _____.

THE PROPOSED SETTLEMENT

7. *What relief does the Settlement provide to the Class Members?*

bebe has agreed to provide each Class Member with the option to receive either (a) a one-time payment of \$20 from bebe made payable to you (a "Settlement Payment"). The terms and conditions of the Settlement Payment are described more fully in Section 2.1(a) of the Settlement Agreement and available on the Settlement Website at _____.

HOW TO REQUEST A SETTLEMENT PAYMENT – SUBMITTING A CLAIM FORM

8. *How can I get a Settlement Payment?*

To qualify for a Settlement Payment, you must submit a valid and complete Claim Form by the deadline. A Claim Form is available by clicking [HERE](#) or on the Internet at the website _____. The Claim Form may be submitted electronically or via email. Read the instructions carefully, fill out the form accurately and completely, and submit the completed Claim Form online on or before 11:59 p.m. (Pacific Standard Time) on _____.

9. *When will I get a Settlement Payment?*

As described in Sections 17 and 18 below, the Court will hold a Final Fairness hearing on _____ at _____, to decide whether to approve the Settlement. If the Court approves the Settlement, after that, there may be appeals. It's always uncertain whether these appeals can be resolved, and resolving them can take time, perhaps more than a year. You can check on the progress of the case on the website dedicated to the Settlement at _____. *Please be patient.*

THE LAWYERS IN THIS CASE AND THE REPRESENTATIVE PLAINTIFF

10. *Do I have a lawyer in this case?*

The Court has ordered that the law firms of Strategic Legal Practices, APC, Mazie Slater Katz & Freeman, LLC, Kearney Littlefield LLP and EcoTech Law Group (“Class Counsel”) will represent the interests of all Class Members. You will not be separately charged for these attorneys. If you want to be represented by your own attorney, you may hire one at your own expense.

11. *How will the lawyers be paid?*

bebe has agreed to pay Class Counsel’s attorneys’ fees and costs up to \$283,000, subject to approval by the Court. You will not be required to pay any attorneys’ fees or costs for Class Counsel’s attorneys’ fees and costs unless you retain your own personal attorney.

12. *Will the Representative Plaintiffs receive any compensation for their efforts in bringing this Action?*

Representative Plaintiff Melita Meyer will request a service award (also known as an “incentive award”) of up to \$2,000 for her services as a subclass representative and Plaintiff Courtney Barrett will request a service award of up to \$1,000 for her services as a subclass representative; Plaintiff Samantha Rodriguez will not receive a service award but bebe has agreed to waive its right to seek reimbursement for its costs relating to the Action filed by Samantha Rodriguez. The Court will make the final decision as to the amount to be paid to the Representative Plaintiffs.

DISMISSAL OF ACTION AND RELEASE OF ALL CLAIMS

13. *What am I giving up to obtain relief under the Settlement?*

If the Court approves the proposed Settlement, unless you timely exclude yourself from the Settlement, you will be releasing any claim that you may have in the Action against bebe. This generally means that you will not be able to file a lawsuit, continue prosecuting a lawsuit, or be part of any other lawsuit against bebe regarding the allegations in the Action. The Settlement Agreement, available on the Settlement Website at _____ contains the full terms of the Settlement Agreement and Release.

HOW TO EXCLUDE YOURSELF FROM THE SETTLEMENT

14. *How do I exclude myself from the Settlement?*

You may exclude yourself from the Class and the Settlement. If you want to be excluded, you must send a letter or postcard stating: (a) the name and case number of the Action “*Meyer, et al., v. bebe stores, inc.*, Case No. 14-cv-00267-YGR”; (b) your full name, address, and mobile telephone number (email address optional); and (c) a statement that you do not wish to

participate in the Settlement, postmarked no later than _____ to the Claims Administrator at:

Meyer, et al., v. bebe stores, inc. Settlement
c/o _____

If you timely request exclusion from the Class, you will be excluded from the Class, you will not be bound by the judgment entered in the Action, you will not be precluded from prosecuting any timely, individual claim against bebe based on the conduct complained of in the Action, and you will not be entitled to receive a Settlement Payment as contemplated by the Settlement.

HOW TO OBJECT TO THE SETTLEMENT

15. *How do I tell the Court that I do not like the Settlement?*

At the date, time, and location stated in Section 18 below, the Court will hold a Fairness Hearing to determine if the Settlement is fair, reasonable, and adequate, and to also consider Class Counsel's request for an award of attorneys' fees and costs, and an incentive or service award to the Representative Plaintiffs.

If you wish to object to the fairness, reasonableness, or adequacy of the Settlement Agreement and Release or the proposed Settlement, you must file a written objection with the Court no later than _____.

Any written objections must include: (a) the name and case number of the Action "*Meyer v. bebe stores, inc., et al.*, Case 14-cv-00267"; (b) the full name, address, and telephone number of the person objecting (email address is optional); (c) the words "Notice of Objection" or "Formal Objection"; and (d) in clear and concise terms, the objection and legal and factual arguments supporting the objection; and (e) facts showing that the person objecting is a Class Member. The written objection must be signed and dated, and must include the following language immediately above the signature and date "I declare under penalty of perjury under the laws of the United States of America that the foregoing statements regarding class membership are true and correct to the best of my knowledge."

IF YOU DO NOT TIMELY MAKE YOUR OBJECTION, YOU WILL BE DEEMED TO HAVE WAIVED ALL OBJECTIONS AND WILL NOT BE ENTITLED TO SPEAK AT THE FAIRNESS HEARING.

If you file a written objection, you may appear at the Fairness Hearing, either in person or through personal attorney hired at your expense, to object to the Settlement Agreement. You are not required, however, to appear. If you, or your attorney, intend to make an appearance at the Fairness Hearing, you must include on your timely and valid objection a statement substantially similar to "Notice of Intention to Appear."

If you intend to appear at the Fairness Hearing through your attorney, you must also identify the attorney(s) representing you who will appear at the Fairness Hearing and include the attorney(s) name, address, phone number, e-mail address, and the state bar(s) to which your attorney is

admitted. Also, if you intend to request the Court to allow you to call witnesses at the Fairness Hearing, such request must be made in your written brief, which must also contain a list of any such witnesses and a summary of each witness's expected testimony.

16. *What is the difference between excluding myself and objecting to the Settlement?*

Objecting is simply telling the Court that you don't like something about the Settlement. You can object only if you stay a Class Member for the Settlement. Excluding yourself is telling the Court that you don't want to be part of the Settlement or a Class Member for the Settlement. If you exclude yourself, you have no basis to object because the Settlement will no longer affect you.

FAIRNESS HEARING

17. *What is the Fairness Hearing?*

The Court has preliminarily approved the Settlement and will hold a hearing to decide whether to give final approval of the Settlement. The purpose of the Fairness Hearing will be for the Court to determine whether the Settlement should be approved as fair, reasonable, adequate, and in the best interests of the Class Members for the Settlement; to consider the award of attorneys' fees and expenses to Class Counsel; and to consider the request for an incentive or service award to the Representative Plaintiffs.

18. *When and where is the Fairness Hearing?*

On _____, 2017, a hearing will be held on the fairness of the proposed Settlement. At the hearing, the Court will be available to hear any objections and arguments concerning the proposed Settlement's fairness. The hearing will take place before the Honorable Yvonne Gonzalez Rogers in Courtroom 1, 4th Floor of the U.S. District Court for the Northern District of California, located at 1301 Clay Street, Oakland, CA 94612. The hearing may be postponed to a different date or time or location without notice. Please check the Settlement Website at _____ for any updates about the Settlement generally or the Fairness Hearing specifically. If the date or time of the Fairness Hearing changes, an update to the Settlement Website will be the only way you will be informed of the change.

19. *May I speak at the hearing?*

At that hearing, the Court will be available to hear any objections and arguments concerning the fairness of the Settlement.

You may attend, but you do not have to. As described above in Section 15, you may speak at the Fairness Hearing only if you have timely filed (a) an objection and (b) a Notice of Intent to Appear.

If you have requested exclusion from the Settlement, however, you may not speak at the Fairness Hearing.

ADDITIONAL INFORMATION

20. *How do I get more information?*

To see a copy of the Settlement Agreement, the Court's Order Granting Preliminary Approval of Class Settlement, Class Counsel's application for attorneys' fees and costs, and the Operative Complaint filed by Plaintiffs Melita Meyer, Samantha Rodriguez and Courtney Barrett in the Action, please visit the Settlement Website at _____. Alternatively, you may contact the Claims Administrator at the email address _____.

This description of this Action is general and does not cover all of the issues and proceedings that have occurred. In order to see the complete file, please visit www.pacer.gov or the Clerk's office at 1301 Clay Street, Oakland, CA 94612. The Clerk will tell you how to obtain the file for inspection and copying at your own expense.

21. *What if my address or other information has changed or changes after I submit a Claim Form?*

It is your responsibility to inform the Claims Administrator of your updated information. You may do so at the address below:

Meyer, et al., v. bebe stores, inc. Settlement
c/o _____

[email address]

**EXCEPT AS OTHERWISE PROVIDED ABOVE,
DO NOT ADDRESS ANY QUESTIONS ABOUT THE SETTLEMENT OR THE LITIGATION TO
THE CLERK OF THE COURT OR THE JUDGE.**